

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)
)
 v.) Crim. No. 04-CR-10336-NMG
)
 JULIO CARRION SANTIAGO et al.)
)

**GOVERNMENT'S MOTION TO FILE MEMORANDUM IN EXCESS OF TWENTY PAGES
IN OPPOSITION TO THE MOTION TO SUPPRESS WIRETAP EVIDENCE
FILED BY DEFENDANT LUIS SANCHEZ (7) AND MOTION TO SEAL**

Pursuant to Local Rule 7.1(B)(4), the United States of America, by and through its attorneys, United States Attorney Michael J. Sullivan and Assistant U. S. Attorney Denise Jefferson Casper, hereby moves to file a memorandum of facts and law that exceeds twenty (20) pages in opposition to the motion filed by Defendant Luis Sanchez ("Sanchez") to suppress wiretap evidence in the captioned matter. In support of this motion, the government states that the memorandum addresses the relevant facts and law as to Sanchez's motion to suppress numerous calls intercepted during the wiretap of two telephones used by his co-defendant Julio Santiago, the main target of a long-term heroin investigation who supplied heroin to numerous customers. The government submits that the legal and factual analysis is necessary for resolution of Sanchez's motion. Since the wiretap orders were issued under seal, the government requests that its memorandum attaching the wiretap applications and orders remain under seal

WHEREFORE, the government respectfully requests that this

Court allow the government leave to file its memorandum in excess of twenty pages in the captioned matter and allow the filing of the memorandum under seal.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By:



DENISE JEFFERSON CASPER
Assistant U.S. Attorney

Dated: June 27, 2005

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon counsel of record in the captioned matter a copy of the foregoing document by electronic filing and depositing in the United States mail a copy of same in an envelope bearing sufficient postage for delivery.

This 27th day of June, 2005.


DENISE JEFFERSON CASPER
ASSISTANT UNITED STATES ATTORNEY